August 2005

Safeguarding Implementation—A Time for Celebration and Reflection

Crossing the Finish Line

The Animal and Plant Health Inspection Service's (APHIS) Plant Protection and Quarantine (PPQ) program is pleased to report that it has completed the implementation process for the stakeholder review entitled *Safeguarding America's Plant Resources*. The Review was carried out at the request of PPQ by 43 stakeholders representing States, industry, academia, and environmental groups. The Safeguarding Review Group presented its report to PPQ in July 1999. It contained more than 300 recommendations for strengthening the safeguarding continuum that protects agriculture and plant resources in the United States from the impact of significant pests. The Safeguarding Review has served as a guiding document for PPQ that has helped the organization strengthen itself to face current and future challenges in a world that is growing increasingly complex.

When the implementation process officially began in March 2000, we indicated that the process of change would require a focused effort and that the entire planning process for the more than 300 recommendations would take upwards of 5 years to complete. We anticipated that the resulting change would occur incrementally, with short-term change occurring in 1 to 3 years, medium-term change occurring in 3 to 5 years and resulting cultural changes occurring in 10 to 20 years. These predictions turned out to be very accurate as we are now just past the fifth year of implementation with every recommendation in the Safeguarding Review having been fully evaluated and either implemented or in the process of being implemented. We made the decision not to implement a small number of recommendations after completing our evaluation, and a number of other recommendations were handed over to the Department of Homeland Security's (DHS) Customs and Border Protection (CBP) agency after the 2003 reorganization.

Challenges Along the Way

One and one-half years into implementation, on September 11, 2001, terrorists attacked the United States, killing thousands, destroying the World Trade Center in New York and severely damaging the Pentagon in Arlington, Virginia. Our world changed drastically and our focus shifted to our national and personal security. We were concerned for our families and other loved ones, for our communities, and for our Nation. As a country, we emerged from this tragedy with a renewed sense of purpose. And in PPQ, we refocused our efforts and energy on safeguarding because it remained our mission and its importance was highlighted by our reinvigorated understanding that our service help feed the world. Food is a fundamental need in a secure world.

A little more than a year after those terrible attacks, the Department of Homeland Security was established and more than 2500 inspection and related positions were transferred from PPQ to CBP. The reorganization required a concerted planning and transition effort and hundreds of people were involved. A smooth transition was vital to the security of the country and the continued safeguarding of agriculture and plant resources. The work did not stop after the reorganization was finished. Because PPQ retained a number of activities directly and indirectly related to port inspection, including development of policies and regulations, training, inspection of propagative material, and risk assessment, we had to ensure that these activities supported both PPQ and CBP activities in pursuit of our now shared mission. We also had to take a look at our mission to see whether or not it had changed. We determined it had not, but that the strategies for carrying it out had indeed changed.

During the years that we have worked to implement the Safeguarding Review, we have also experienced potentially disruptive consolidation of our regional offices into two locations and terrible pest and disease outbreaks, from foot-and-mouth disease in England and avian flu in Asia to the spread of citrus canker and the introduction of Asian longhorned beetle and ralstonia into the United States. Each one of these outbreaks required PPQ's attention and support and each of them had the potential to derail our efforts at Safeguarding implementation.

Accomplishments

The challenges were many, but we persevered and our understanding and commitment and accomplishments grew. In PPQ's first report on Safeguarding implementation in 2001, we spoke of our accomplishments in addressing foundational recommendations in this stakeholder review of the safeguarding continuum. We highlighted the passage of the Plant Protection Act. We highlighted a refinement of the mission, we worked on developing a comprehensive new civil penalty system. We increased our user fees to provide a stronger infrastructure and support for safeguarding activities. We developed a strategic plan to convert the Smuggling Interdiction and Trade Compliance program into a permanent, national program and we have supported the growth of this important activity to ensure that we can address open pathways for risk. We strengthened and restructured our risk assessment work, and we began to build a strong methods development program through our Center for Plant Health Science and Technology.

While we necessarily refocused our attention on larger security issues in that troubling year of 2001 kept, we nonetheless kept our implementation efforts afloat. We completed the installation of digital imaging technology at all major ports of entry in the United States for use in pest identification. We worked with the International Plant Protection Convention to develop, for the first time, a strategic plan for this important standard-setting body. We reorganized our headquarters staff to directly link pest detection activities with emergency response activities. We secured additional funding for pest detection and began to establish the three-tier committee approach to evaluation and prioritizing pest detection needs. To better identify additional sources of risk, we conducted pathway risk assessments on the Canadian border, transit shipments, private

aircraft, and cruise ships. The electronic Phytosanitary Certificate Issuance and Tracking system began the development phase. Our identification network increased, especially in the area of botany, through additional hires and the engagement of specialists in the field from throughout the world. And we began to assess the effectiveness of our internal communication processes, procedures, and practices throughout the organization.

Toward the end of 2003, we reported on the impact of the establishment of the Department of Homeland Security and the concomitant transfer of about 2500 PPQ positions to the new Department's Customs and Border Protection (CBP) agency. We reviewed the recommendations to identify those that would now fall squarely within the purview of CBP, those that would be a shared responsibility, and those that would be retained in PPQ for implementation. Only a few were given over to CBP. About another dozen were to be a shared responsibility. Most of the recommendations were retained by PPQ because they address functions that remained in PPQ after the reorganization. The retained recommendations were important not only to our support of CBP's agriculture activities, but to the PPQ Plant Inspection Stations, which continue to play a critical exclusion role through inspection of imported propagative material.

Shortly after the reorganization, PPQ paused for some much-needed reflection. We assessed our past, present, and future and reaffirmed our mission. There was recognition at the same time that the strategies for accomplishing the mission had necessarily changed. This has had an impact on some of the safeguarding recommendations and our view of how they should be carried out, but it has not diminished the relevance of the Safeguarding Review of the importance of continual learning and continual improvement. What we had already accomplished in implementation strengthened us to face the extreme challenges that were associated with the terrorist attacks and the reorganization. And world events helped us refocus our safeguarding priorities and hone our response.

Part of that fine-tuning was to turn our attention outward to define and address risk before it approaches our shores. The results of that effort were the Offshore Pest Information System (OPIS) and the Global Pest and Disease Database (GPDD). OPIS is a real-time system for gathering information about changing pest and pathway conditions worldwide. It is intended to be used to generate alerts and make operational, regulatory, and policy decisions. It is also used to provide alerts to CBP. GPDD, on the other hand, is a repository for information about pests throughout the world. Some of the information in OPIS is archived in GPDD, and GPDD has links to numerous other useful systems as well. OPIS is populated, in large part, by APHIS employees overseas, who were hired specifically for that purpose.

Emergency preparedness became an even more critical need after September 11 and PPQ moved aggressively to address that need, updating existing emergency response plans, developing new ones, training the entire workforce in the Incident Command System, which will be used by Federal, State and local responders to respond to all types of hazards. Employees were given the opportunity to exercise the knowledge through simulation training. We began to rebuild our response infrastructure, which was

diminished by the transfer of so many employees to CBP. We also scanned the horizon for potential near-term risks approaching the United States and identified soybean rust as an imminent threat. This led to a significant planning effort to ensure that we would be able to respond in the best way possible to protect soybean production in the United States. When soybean rust reached our shores last year, our planning effort and advance work paid off. The introduction of soybean rust highlights another technology—spatial imaging and analysis—that PPQ has adapted for many purposes as recommended in the Review. This technology is being widely used to input data from pest survey activities and it supports predictive modeling in our soybean rust and other efforts.

In 2003, we established the Deputy Administrator's Safeguarding Award to highlight some of the accomplishments arising from or inspired by the Review. The first two awards were presented for two different efforts to better manage transit shipments of commodities through the United States destined for a third country. One system was a paper tracking system and the other was an electronic seal and tracking system. Both were successful efforts and the two were joined into one project shortly after being presented the award. Electronic technology is being applied in other areas as well. For example, we continue to develop an electronic permitting system and an electronic export certification system. The advances in technology use that arose from the Safeguarding Review led us to explore the applicability of technology in other areas as well, as is evidenced by our adoption of barcoding technology to provide electronic documentation of all pest interceptions.

Over the past year and a half, we have made additional strides with implementation. Stakeholder collaboration continues to improve, although we recognize that all such relationships require continual nurturing. In December 2003, PPQ held a stakeholder meeting with the participation of about 100 stakeholders. In addition to providing general updates on issues of interest, we ran five concurrent sessions on various topics to allow for more in-depth discussion and exchange of ideas. In spring of 2004, PPQ took the leadership in bringing State and Federal officials to gain consensus over Federal regulation of nursery stock because of *P. ramorum*. PPQ has reached out to more stakeholders in advance of decisionmaking and rulemaking to gather information in support of risk assessments and policy and regulatory development. For example, we recently held the first in a series of public meetings about our revision of the nursery stock regulations, also known as Q-37.

Work continues on the development of standard operating procedures for emergency response, training of the workforce and cooperators in the incident command system and preparing the workforce to be involved in all-hazard responses. In developing response plans, our priority is to develop plans for select agents under the Bioterrorism Act, with focus shifting to other priority pests once the select agents are addressed. Working with the Coooperative State Research, Education, and Economics Service, we have put in place a National Plant Diagnostic Network to supplement our pest identification activities. In conjunction with this, we are working to strengthen our own molecular diagnostics capacity in the areas of technology development, validation, training, and

operations. In the not-too-distant future, we will have a laboratory accreditation program in place that will further expand diagnostic capacity within the United States.

To ensure that our activities continue on a sound financial footing, we are pursuing regulations to establish user fees for the movement of people and goods from Canada into the United States and we have increased the existing user fees on international travel and trade to better support both CBP and PPQ activities. We are working to establish import permit user fees for the first time and we are updating export certification user fees for the first time since they were established more than a decade ago.

Perhaps the greatest single accomplishment to be derived from the Safeguarding Review is the establishment within the PPQ culture of a will to improve. The recommendations in the Safeguarding Review and the support of PPQ's stakeholder community have inspired us to not only implement the recommendations of the Review, but to look beyond them for additional opportunities to strengthen, improve, or enhance our efforts. We gratefully acknowledge the dedicated work of the Review group and of the many employees of PPQ, partner agencies, and State cooperators who worked on planning, peer review, and implementation activities in support of the Safeguarding Review recommendations. We appreciate the support and commitment of the leadership within Plant Protection and Quarantine, the Animal and Plant Health Inspection Service, and the U.S. Department of Agriculture. The support and engagement of the stakeholder community was equally critical to our success. PPQ is a very different organization from what it was in 1999 when the Safeguarding Review was completed. We are stronger. We are more prepared to meet the challenges of the modern world. We are focused on the future, but ever mindful of our proud past